

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

ALBERT L. GRAY, Administrator, et al)	
Plaintiffs)	
)	
vs.)	C.A. No.: 04-312-L
)	
)	
JEFFREY DERDERIAN, et al.)	
Defendants)	

**DEFENDANTS ANHEUSER-BUSCH, INC. AND
ANHEUSER-BUSCH COMPANIES, INC.'S
ANSWER AND AFFIRMATIVE DEFENSES TO PLAINTIFFS' FIRST
AMENDED MASTER COMPLAINT**

NOW COME Defendants Anheuser-Busch, Inc. ("ABI") and Anheuser-Busch Companies, Inc. ("ABC") and for their answer to Plaintiffs' First Amended Master Complaint ("First Amended Complaint") state as follows:

INTRODUCTION

Plaintiffs' First Amended Complaint includes an introductory statement to which no response is required. To the extent there are factual allegations contained in the introductory statement to Plaintiffs' First Amended Complaint, ABI and ABC deny any such allegations in the introductory statement to Plaintiffs' First Amended Complaint to the extent they pertain to them.

PARTIES

Plaintiffs

1. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 1 of the First Amended Complaint, including any of its subparts.

2. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 2 of the First Amended Complaint.

3. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 3 of the First Amended Complaint, including any of its subparts.

4. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 4 of the First Amended Complaint.

5. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 5 of the First Amended Complaint, including any of its subparts.

6. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 6 of the First Amended Complaint, including any of its subparts.

7. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 7 of the First Amended Complaint.

8. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 8 of the First Amended Complaint, including any of its subparts.

9. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 9 of the First Amended Complaint.

10. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 10 of the First Amended Complaint.

11. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 11 of the First Amended Complaint, including any of its subparts.

12. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 12 of the First Amended Complaint.

13. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 13 of the First Amended Complaint, including any of its subparts.

14. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 14 of the First Amended Complaint.

15. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 15 of the First Amended Complaint, including any of its subparts.

16. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 16 of the First Amended Complaint.

17. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 17 of the First Amended Complaint, including any of its subparts.

18. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 18 of the First Amended Complaint.

19. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 19 of the First Amended Complaint, including any of its subparts.

20. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 20 of the First Amended Complaint, including any of its subparts.

21. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 21 of the First Amended Complaint, including any of its subparts.

22. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 22 of the First Amended Complaint, including any of its subparts.

23. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 23 of the First Amended Complaint.

24. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 24 of the First Amended Complaint.

25. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 25 of the First Amended Complaint.

26. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 26 of the First Amended Complaint.

27. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 27 of the First Amended Complaint, including any of its subparts.

28. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 28 of the First Amended Complaint.

29. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 29 of the First Amended Complaint.

30. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 30 of the First Amended Complaint.

31. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 31 of the First Amended Complaint.

32. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 32 of the First Amended Complaint, including any of its subparts.

33. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 33 of the First Amended Complaint, including any of its subparts.

34. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 34 of the First Amended Complaint, including any of its subparts.

35. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 35 of the First Amended Complaint, including any of its subparts.

36. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 36 of the First Amended Complaint, including any of its subparts.

37. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 37 of the First Amended Complaint.

38. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 38 of the First Amended Complaint.

39. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 39 of the First Amended Complaint.

40. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 40 of the First Amended Complaint, including any of its subparts.

41. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 41 of the First Amended Complaint, including any of its subparts.

42. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 42 of the First Amended Complaint.

43. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 43 of the First Amended Complaint, including any of its subparts.

44. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 44 of the First Amended Complaint.

45. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 45 of the First Amended Complaint, including any of its subparts.

46. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 46 of the First Amended Complaint, including any of its subparts.

47. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 47 of the First Amended Complaint.

48. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 48 of the First Amended Complaint, including any of its subparts.

49. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 49 of the First Amended Complaint.

50. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 50 of the First Amended Complaint, including any of its subparts.

51. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 51 of the First Amended Complaint.

52. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 52 of the First Amended Complaint, including any of its subparts.

53. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 53 of the First Amended Complaint.

54. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 54 of the First Amended Complaint.

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56. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 56 of the First Amended Complaint, including any of its subparts.

57. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 57 of the First Amended Complaint.

58. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 58 of the First Amended Complaint.

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61. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 61 of the First Amended Complaint.

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66. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 66 of the First Amended Complaint, including any of its subparts.

67. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 67 of the First Amended Complaint.

68. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 68 of the First Amended Complaint, including any of its subparts.

69. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 69 of the First Amended Complaint.

70. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 70 of the First Amended Complaint.

71. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 71 of the First Amended Complaint.

72. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 72 of the First Amended Complaint, including any of its subparts.

73. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 73 of the First Amended Complaint.

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76. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 76 of the First Amended Complaint, including any of its subparts.

77. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 77 of the First Amended Complaint.

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80. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 80 of the First Amended Complaint.

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82. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 82 of the First Amended Complaint.

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84. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 84 of the First Amended Complaint.

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86. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 86 of the First Amended Complaint.

87. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 87 of the First Amended Complaint, including any of its subparts.

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98. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 98 of the First Amended Complaint, including any of its subparts.

99. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 99 of the First Amended Complaint.

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101. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 101 of the First Amended Complaint.

102. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 102 of the First Amended Complaint, including any of its subparts.

103. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 103 of the First Amended Complaint.

104. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 104 of the First Amended Complaint.

105. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 105 of the First Amended Complaint, including any of its subparts.

106. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 106 of the First Amended Complaint, including any of its subparts.

107. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 107 of the First Amended Complaint.

108. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 108 of the First Amended Complaint, including any of its subparts.

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110. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 110 of the First Amended Complaint, including any of its subparts.

111. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 111 of the First Amended Complaint, including any of its subparts.

112. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 112 of the First Amended Complaint, including any of its subparts.

113. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 113 of the First Amended Complaint, including any of its subparts.

114. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 114 of the First Amended Complaint, including any of its subparts.

115. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 115 of the First Amended Complaint.

116. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 116 of the First Amended Complaint.

117. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 117 of the First Amended Complaint.

118. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 118 of the First Amended Complaint, including any of its subparts.

119. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 119 of the First Amended Complaint, including any of its subparts.

120. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 120 of the First Amended Complaint.

121. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 121 of the First Amended Complaint.

122. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 122 of the First Amended Complaint.

123. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 123 of the First Amended Complaint.

124. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 124 of the First Amended Complaint, including any of its subparts.

125. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 125 of the First Amended Complaint.

126. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 126 of the First Amended Complaint.

127. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 127 of the First Amended Complaint, including any of its subparts.

128. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 128 of the First Amended Complaint, including any of its subparts.

129. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 129 of the First Amended Complaint, including any of its subparts.

130. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 130 of the First Amended Complaint.

131. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 131 of the First Amended Complaint.

132. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 132 of the First Amended Complaint.

133. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 133 of the First Amended Complaint.

134. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 134 of the First Amended Complaint.

135. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 135 of the First Amended Complaint, including any of its subparts.

136. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 136 of the First Amended Complaint, including any of its subparts.

137. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 137 of the First Amended Complaint, including any of its subparts.

138. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 138 of the First Amended Complaint, including any of its subparts.

139. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 139 of the First Amended Complaint.

140. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 140 of the First Amended Complaint, including any of its subparts.

141. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 141 of the First Amended Complaint.

142. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 142 of the First Amended Complaint, including any of its subparts.

143. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 143 of the First Amended Complaint, including any of its subparts.

144. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 144 of the First Amended Complaint.

145. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 145 of the First Amended Complaint, including any of its subparts.

146. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 146 of the First Amended Complaint.

147. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 147 of the First Amended Complaint.

148. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 148 of the First Amended Complaint.

149. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 149 of the First Amended Complaint.

150. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 150 of the First Amended Complaint.

151. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 151 of the First Amended Complaint.

152. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 152 of the First Amended Complaint.

153. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 153 of the First Amended Complaint.

154. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 154 of the First Amended Complaint, including any of its subparts.

155. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 155 of the First Amended Complaint, including any of its subparts.

156. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 156 of the First Amended Complaint.

157. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 157 of the First Amended Complaint, including any of its subparts.

158. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 158 of the First Amended Complaint.

159. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 159 of the First Amended Complaint, including any of its subparts.

160. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 160 of the First Amended Complaint.

161. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 161 of the First Amended Complaint.

162. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 162 of the First Amended Complaint, including any of its subparts.

163. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 163 of the First Amended Complaint.

164. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 164 of the First Amended Complaint.

165. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 165 of the First Amended Complaint.

166. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 166 of the First Amended Complaint.

167. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 167 of the First Amended Complaint.

168. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 168 of the First Amended Complaint, including any of its subparts.

169. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 169 of the First Amended Complaint, including any of its subparts.

170. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 170 of the First Amended Complaint.

171. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 171 of the First Amended Complaint, including any of its subparts.

172. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 172 of the First Amended Complaint.

173. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 173 of the First Amended Complaint.

174. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 174 of the First Amended Complaint.

175. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 175 of the First Amended Complaint.

176. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 176 of the First Amended Complaint.

177. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 177 of the First Amended Complaint.

178. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 178 of the First Amended Complaint.

179. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 179 of the First Amended Complaint, including any of its subparts.

180. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 180 of the First Amended Complaint, including any of its subparts.

181. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 181 of the First Amended Complaint, including any of its subparts.

182. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 182 of the First Amended Complaint, including any of its subparts.

183. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 183 of the First Amended Complaint, including any of its subparts.

184. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 184 of the First Amended Complaint.

185. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 185 of the First Amended Complaint.

186. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 186 of the First Amended Complaint.

187. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 187 of the First Amended Complaint, including any of its subparts.

188. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 188 of the First Amended Complaint, including any of its subparts.

189. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 189 of the First Amended Complaint.

190. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 190 of the First Amended Complaint, including any of its subparts.

191. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 191 of the First Amended Complaint, including any of its subparts.

192. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 192 of the First Amended Complaint, including any of its subparts.

193. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 193 of the First Amended Complaint, including any of its subparts.

194. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 194 of the First Amended Complaint, including any of its subparts.

195. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 195 of the First Amended Complaint.

196. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 196 of the First Amended Complaint.

197. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 197 of the First Amended Complaint, including any of its subparts.

198. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 198 of the First Amended Complaint.

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203. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 203 of the First Amended Complaint.

204. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 204 of the First Amended Complaint.

205. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 205 of the First Amended Complaint, including any of its subparts.

206. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 206 of the First Amended Complaint.

207. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 207 of the First Amended Complaint.

208. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 208 of the First Amended Complaint.

209. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 209 of the First Amended Complaint.

210. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 210 of the First Amended Complaint.

211. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 211 of the First Amended Complaint.

212. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 212 of the First Amended Complaint, including any of its subparts.

213. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 213 of the First Amended Complaint, including any of its subparts.

214. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 214 of the First Amended Complaint.

215. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 215 of the First Amended Complaint.

216. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 216 of the First Amended Complaint, including any of its subparts.

217. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 217 of the First Amended Complaint.

218. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 218 of the First Amended Complaint.

219. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 219 of the First Amended Complaint.

220. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 220 of the First Amended Complaint.

221. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 221 of the First Amended Complaint.

222. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 222 of the First Amended Complaint, including any of its subparts.

223. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 223 of the First Amended Complaint, including any of its subparts.

224. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 224 of the First Amended Complaint, including any of its subparts.

225. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 225 of the First Amended Complaint.

226. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 226 of the First Amended Complaint, including any of its subparts.

227. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 227 of the First Amended Complaint, including any of its subparts.

228. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 228 of the First Amended Complaint, including any of its subparts.

229. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 229 of the First Amended Complaint, including any of its subparts.

230. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 230 of the First Amended Complaint, including any of its subparts.

231. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 231 of the First Amended Complaint.

232. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 232 of the First Amended Complaint.

233. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 233 of the First Amended Complaint.

234. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 234 of the First Amended Complaint, including any of its subparts.

235. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 235 of the First Amended Complaint, including any of its subparts.

236. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 236 of the First Amended Complaint.

237. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 237 of the First Amended Complaint, including any of its subparts.

238. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 238 of the First Amended Complaint.

239. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 239 of the First Amended Complaint.

240. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 240 of the First Amended Complaint.

241-270. Paragraphs 241 through 270 of the First Amended Complaint, inclusive, purport to be reserved, and therefore no response by ABI and ABC is required.

GENERAL ALLEGATIONS AS TO ALL DEFENDANTS

271. ABI and ABC deny the allegations contained in paragraph 271 of the First Amended Complaint.

JEFFREY DERDERIAN

272. ABI and ABC reassert and incorporate by reference their responses to paragraphs 1 through 271 of the First Amended Complaint, inclusive, as though fully set forth herein.

273. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 273 of the First Amended Complaint.

274-279. The allegations contained in paragraphs 274 through 279 of the First Amended Complaint, inclusive, including all subparts, are directed against Defendant Jeffrey Derderian and are not directed against ABI or ABC, and therefore no answer by ABI and ABC is required. ABI and ABC deny the allegations contained in paragraphs 274 through 279 of the First Amended Complaint, inclusive, including all subparts, insofar as any allegation in paragraphs 274 through 279, inclusive, including any subpart, might be construed to pertain to them.

COUNT I
JEFFREY DERDERIAN - NEGLIGENCE

280. ABI and ABC reassert and incorporate by reference their responses to paragraphs 1 through 279 of the First Amended Complaint, inclusive, as though fully set forth herein.

281. The allegations contained in paragraph 281 of Count I of the First Amended Complaint are directed against Defendant Jeffrey Derderian and are not directed against ABI or ABC, and therefore no answer by ABI and ABC is required. ABI and ABC deny the allegations contained in paragraph 281 of Count I of the First Amended Complaint insofar as any allegation in paragraph 281 might be construed to pertain to them.

COUNT II
VIOLATION OF RHODE ISLAND GENERAL LAWS
TITLE 9, CHAPTER 1, SECTION 2

282. ABI and ABC reassert and incorporate by reference their responses to paragraphs 1 through 279 of the First Amended Complaint, inclusive, as though fully set forth herein.

283. The allegations contained in paragraph 283 of Count II of the First Amended Complaint appear to be directed against Defendant Jeffrey Derderian and are not directed against ABI or ABC, and therefore no answer by ABI and ABC is required. ABI and ABC deny the allegations contained in paragraph 283 of Count II of the First Amended Complaint insofar as any allegation in paragraph 283 might be construed to pertain to them.

MICHAEL DERDERIAN

284. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 284 of the First Amended Complaint.

285-286. The allegations contained in paragraphs 285 through 286 of the First Amended Complaint, inclusive, including all subparts, are directed against Defendant Michael Derderian and are not directed against ABI or ABC, and therefore no answer by ABI and ABC is required. ABI and ABC deny the allegations contained in paragraphs 285 through 286 of the First Amended

Complaint, inclusive, including all subparts, insofar as any allegation in paragraphs 285 through 286, including any subpart, might be construed to pertain to them.

COUNT III
MICHAEL DERDERIAN - NEGLIGENCE

287. ABI and ABC reassert and incorporate by reference their responses to paragraphs 1 through 271 and 284 through 286 of the First Amended Complaint, inclusive, as though fully set forth herein.

288. The allegations contained in paragraph 288 of Count III of the First Amended Complaint are directed against Defendant Michael Derderian and are not directed against ABI or ABC, and therefore no answer by ABI and ABC is required. ABI and ABC deny the allegations contained in paragraph 288 of Count III of the First Amended Complaint insofar as any allegation in paragraph 288 might be construed to pertain to them.

COUNT IV
VIOLATION OF RHODE ISLAND GENERAL LAWS
TITLE 9, CHAPTER 1, SECTION 2

289. ABI and ABC reassert and incorporate by reference their responses to paragraphs 1 through 271 and 284 through 286 of the First Amended Complaint, inclusive, as though fully set forth herein.

290. The allegations contained in paragraph 290 of Count IV of the First Amended Complaint appear to be directed against Defendant Michael Derderian and are not directed against ABI or ABC, and therefore no answer by ABI

and ABC is required. ABI and ABC deny the allegations contained in paragraph 290 of Count IV of the First Amended Complaint insofar as any allegation in paragraph 290 might be construed to pertain to them.

DERCO, LLC

291. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 291 of the First Amended Complaint.

292-293. The allegations contained in paragraphs 292 through 293 of the First Amended Complaint, inclusive, including all subparts, are directed against Defendant DERCO, LLC and are not directed against ABI or ABC, and therefore no answer by ABI and ABC is required. ABI and ABC deny the allegations contained in paragraphs 292 through 293 of the First Amended Complaint, inclusive, including all subparts, insofar as any allegation in paragraphs 292 through 293, including any subpart, might be construed to pertain to them.

COUNT V
DERCO, LLC - NEGLIGENCE

294. ABI and ABC reassert and incorporate by reference their responses to paragraphs 1 through 271 and 291 through 293 of the First Amended Complaint, inclusive, as though fully set forth herein.

295. The allegations contained in paragraph 295 of Count V of the First Amended Complaint are directed against Defendant DERCO, LLC and are not

directed against ABI or ABC, and therefore no answer by ABI and ABC is required.

ABI and ABC deny the allegations contained in paragraph 295 of Count V of the First Amended Complaint insofar as any allegation in paragraph 295 might be construed to pertain to them.

COUNT VI
VIOLATION OF RHODE ISLAND GENERAL LAWS
TITLE 9, CHAPTER 1, SECTION 2

296. ABI and ABC reassert and incorporate by reference their responses to paragraphs 1 through 271 and 291 through 293 of the First Amended Complaint, inclusive, as though fully set forth herein.

297. The allegations contained in paragraph 297 of Count VI of the First Amended Complaint appear to be directed against Defendant DERCO, LLC and are not directed against ABI or ABC, and therefore no answer by ABI and ABC is required. ABI and ABC deny the allegations contained in paragraph 297 of Count VI of the First Amended Complaint insofar as any allegation in paragraph 297 might be construed to pertain to them.

HOWARD JULIAN

298. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 298 of the First Amended Complaint.

299. The allegations contained in paragraph 299 of the First Amended Complaint are directed against Defendant Howard Julian and are not

directed against ABI or ABC, and therefore no answer by ABI and ABC is required. ABI and ABC deny the allegations contained in paragraph 299 of the First Amended Complaint insofar as any allegation in paragraph 299 might be construed to pertain to them.

COUNT VII
HOWARD JULIAN - NEGLIGENCE

300. ABI and ABC reassert and incorporate by reference their responses to paragraphs 1 through 271 and 298 through 299 of the First Amended Complaint, inclusive, as though fully set forth herein.

301. The allegations contained in paragraph 301 of Count VII of the First Amended Complaint are directed against Defendant Howard Julian and are not directed against ABI or ABC, and therefore no answer by ABI and ABC is required. ABI and ABC deny the allegations contained in paragraph 301 of Count VII of the First Amended Complaint insofar as any allegation in paragraph 301 might be construed to pertain to them.

COUNT VIII
VIOLATION OF RHODE ISLAND GENERAL LAWS
TITLE 9, CHAPTER 1, SECTION 2

302. ABI and ABC reassert and incorporate by reference their responses to paragraphs 1 through 271 and 298 through 299 of the First Amended Complaint, inclusive, as though fully set forth herein.

303. The allegations contained in paragraph 303 of Count VIII of the First Amended Complaint appear to be directed against Defendant Howard Julian and are not directed against ABI or ABC, and therefore no answer by ABI and ABC is required. ABI and ABC deny the allegations contained in paragraph 303 of Count VIII of the First Amended Complaint insofar as any allegation in paragraph 303 might be construed to pertain to them.

TRITON REALTY LIMITED PARTNERSHIP

304. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 304 of the First Amended Complaint.

305-307. The allegations contained in paragraphs 305 through 307 of the First Amended Complaint, inclusive, are directed against Defendant Triton Realty Limited Partnership and are not directed against ABI or ABC, and therefore no answer by ABI and ABC is required. ABI and ABC deny the allegations contained in paragraphs 305 through 307 of the First Amended Complaint, inclusive, insofar as any allegation in paragraphs 305 through 307 might be construed to pertain to them.

COUNT IX
TRITON REALTY LIMITED PARTNERSHIP - NEGLIGENCE

308. ABI and ABC reassert and incorporate by reference their responses to paragraphs 1 through 271 and 304 through 307 of the First Amended Complaint, inclusive, as though fully set forth herein.

309. The allegations contained in paragraph 309 of Count IX of the First Amended Complaint are directed against Defendant Triton Realty Limited Partnership and are not directed against ABI or ABC, and therefore no answer by ABI and ABC is required. ABI and ABC deny the allegations contained in paragraph 309 of Count IX of the First Amended Complaint insofar as any allegation in paragraph 309 might be construed to pertain to them.

COUNT X
VIOLATION OF RHODE ISLAND GENERAL LAWS
TITLE 9, CHAPTER 1, SECTION 2

310. ABI and ABC reassert and incorporate by reference their responses to paragraphs 1 through 271 and 304 through 307 of the First Amended Complaint, inclusive, as though fully set forth herein.

311. The allegations contained in paragraph 311 of Count X of the First Amended Complaint appear to be directed against Defendant Triton Realty Limited Partnership and are not directed against ABI or ABC, and therefore no answer by ABI and ABC is required. ABI and ABC deny the allegations contained in paragraph 311 of Count X of the First Amended Complaint insofar as any allegation in paragraph 311 might be construed to pertain to them.

TRITON REALTY, INC.

312. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 312 of the First Amended Complaint.

313-315. The allegations contained in paragraphs 313 through 315 of the First Amended Complaint, inclusive, are directed against Defendant Triton Realty, Inc. and are not directed against ABI or ABC, and therefore no answer by ABI and ABC is required. ABI and ABC deny the allegations contained in paragraphs 313 through 315 of the First Amended Complaint, inclusive, insofar as any allegation in paragraphs 313 through 315 might be construed to pertain to them.

COUNT XI
TRITON REALTY, INC. - NEGLIGENCE

316. ABI and ABC reassert and incorporate by reference their responses to paragraphs 1 through 271 and 312 through 315 of the First Amended Complaint, inclusive, as though fully set forth herein.

317. The allegations contained in paragraph 317 of Count XI of the First Amended Complaint are directed against Defendant Triton Realty, Inc. and are not directed against ABI or ABC, and therefore no answer by ABI and ABC is required. ABI and ABC deny the allegations contained in paragraph 317 of Count XI of the First Amended Complaint insofar as any allegation in paragraph 317 might be construed to pertain to them.

COUNT XII
VIOLATION OF RHODE ISLAND GENERAL LAWS
TITLE 9, CHAPTER 1, SECTION 2

318. ABI and ABC reassert and incorporate by reference their responses to paragraphs 1 through 271 and 312 through 315 of the First Amended Complaint, inclusive, as though fully set forth herein.

319. The allegations contained in paragraph 319 of Count XII of the First Amended Complaint appear to be directed against Defendant Triton Realty, Inc. and are not directed against ABI or ABC, and therefore no answer by ABI and ABC is required. ABI and ABC deny the allegations contained in paragraph 319 of Count XII of the First Amended Complaint insofar as any allegation in paragraph 319 might be construed to pertain to them.

RAYMOND J. VILLANOVA

320. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 320 of the First Amended Complaint.

321-323. The allegations contained in paragraphs 321 through 323 of the First Amended Complaint, inclusive, are directed against Defendant Raymond J. Villanova and are not directed against ABI or ABC, and therefore no answer by ABI and ABC is required. ABI and ABC deny the allegations contained in paragraphs 321 through 323 of the First Amended Complaint, inclusive, insofar as any allegation in paragraphs 321 through 323 might be construed to pertain to them.

COUNT XIII
RAYMOND J. VILLANOVA - NEGLIGENCE

324. ABI and ABC reassert and incorporate by reference their responses to paragraphs 1 through 271 and 320 through 323 of the First Amended Complaint, inclusive, as though fully set forth herein.

325. The allegations contained in paragraph 325 of Count XIII of the First Amended Complaint are directed against Defendant Raymond J. Villanova and are not directed against ABI or ABC, and therefore no answer by ABI and ABC is required. ABI and ABC deny the allegations contained in paragraph 325 of Count XIII of the First Amended Complaint insofar as any allegation in paragraph 325 might be construed to pertain to them.

COUNT XIV
VIOLATION OF RHODE ISLAND GENERAL LAWS
TITLE 9, CHAPTER 1, SECTION 2

326. ABI and ABC reassert and incorporate by reference their responses to paragraphs 1 through 271 and 320 through 323 of the First Amended Complaint, inclusive, as though fully set forth herein.

327. The allegations contained in paragraph 327 of Count XIV of the First Amended Complaint appear to be directed against Defendant Raymond J. Villanova and are not directed against ABI or ABC, and therefore no answer by ABI and ABC is required. ABI and ABC deny the allegations contained in paragraph 327 of Count XIV of the First Amended Complaint insofar as any allegation in paragraph 327 might be construed to pertain to them.

JACK RUSSELL

328. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 328 of the First Amended Complaint.

329-331. The allegations contained in paragraphs 329 through 331 of the First Amended Complaint, inclusive, including all subparts, are directed against Defendant Jack Russell and are not directed against ABI or ABC, and therefore no answer by ABI and ABC is required. ABI and ABC deny the allegations contained in paragraphs 329 through 331 of the First Amended Complaint, inclusive, including all subparts, insofar as any allegation in paragraphs 329 through 331, including any subpart, might be construed to pertain to them.

COUNT XV
JACK RUSSELL - NEGLIGENCE

332. ABI and ABC reassert and incorporate by reference their responses to paragraphs 1 through 271 and 328 through 331 of the First Amended Complaint, inclusive, as though fully set forth herein.

333. The allegations contained in paragraph 333 of Count XV of the First Amended Complaint are directed against Defendant Jack Russell and are not directed against ABI or ABC, and therefore no answer by ABI and ABC is required. ABI and ABC deny the allegations contained in paragraph 333 of Count XV of the First Amended Complaint insofar as any allegation in paragraph 333 might be construed to pertain to them.

COUNT XVI
VIOLATION OF RHODE ISLAND GENERAL LAWS
TITLE 9, CHAPTER 1, SECTION 2

334. ABI and ABC reassert and incorporate by reference their responses to paragraphs 1 through 271 and 328 through 331 of the First Amended

Complaint, inclusive, as though fully set forth herein. The remainder of the allegations contained in paragraph 334 of Count XVI of the First Amended Complaint appear to be directed against Defendant Jack Russell and are not directed against ABI or ABC, and therefore no answer by ABI and ABC is required. ABI and ABC deny the remaining allegations contained in paragraph 334 of Count XVI of the First Amended Complaint insofar as any of the remaining allegations in paragraph 334 might be construed to pertain to them.

JACK RUSSELL TOURING, INC.

335. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in the first two sentences of paragraph 335 of the First Amended Complaint. The remainder of the allegations contained in paragraph 335 of the First Amended Complaint are directed against Defendant Jack Russell Touring, Inc. and are not directed against ABI or ABC, and therefore no answer by ABI and ABC is required. ABI and ABC deny the allegations contained in paragraph 335 of the First Amended Complaint insofar as any allegations in paragraph 335 might be construed to pertain to them.

336-339. The allegations contained in paragraphs 336 through 339 of the First Amended Complaint, inclusive, including all subparts, are directed against Defendant Jack Russell Touring, Inc. and are not directed against ABI or ABC, and therefore no answer by ABI and ABC is required. ABI and ABC deny the allegations contained in paragraphs 336 through 339 of the First Amended

Complaint, inclusive, including all subparts, insofar as any allegation in paragraphs 336 through 339, including any subpart, might be construed to pertain to them.

COUNT XVII
JACK RUSSELL TOURING, INC. - NEGLIGENCE

340. ABI and ABC reassert and incorporate by reference their responses to paragraphs 1 through 271 and 335 through 339 of the First Amended Complaint, inclusive, as though fully set forth herein.

341. The allegations contained in paragraph 341 of Count XVII of the First Amended Complaint are directed against Defendant Jack Russell Touring, Inc. and are not directed against ABI or ABC, and therefore no answer by ABI and ABC is required. ABI denies the allegations contained in paragraph 341 of Count XVII of the First Amended Complaint insofar as any allegation in paragraph 341 might be construed to pertain to them.

COUNT XVIII
VIOLATION OF RHODE ISLAND GENERAL LAWS
TITLE 9, CHAPTER 1, SECTION 2

342. ABI and ABC reassert and incorporate by reference their responses to paragraphs 1 through 271 and 335 through 339 of the First Amended Complaint, inclusive, as though fully set forth herein.

343. The allegations contained in paragraph 343 of Count XVIII of the First Amended Complaint appear to be directed against Defendant Jack Russell Touring, Inc. and are not directed against ABI or ABC, and therefore no answer by

ABI and ABC is required. ABI and ABC deny the allegations contained in paragraph 343 of Count XVIII of the First Amended Complaint insofar as any allegation in paragraph 343 might be construed to pertain to them.

PAUL WOOLNOUGH

344. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 344 of the First Amended Complaint.

345-347. The allegations contained in paragraphs 345 through 347 of the First Amended Complaint, inclusive, including all subparts, are directed against Defendant Paul Woolnough and are not directed against ABI or ABC, and therefore no answer by ABI and ABC is required. ABI and ABC deny the allegations contained in paragraphs 345 through 347 of the First Amended Complaint, inclusive, including all subparts, insofar as any allegation in paragraphs 345 through 347, including any subpart, might be construed to pertain to them.

COUNT XIX
PAUL WOOLNOUGH - NEGLIGENCE

348. ABI and ABC reassert and incorporate by reference their responses to paragraphs 1 through 271 and 344 through 347 of the First Amended Complaint, inclusive, as though fully set forth herein.

349. The allegations contained in paragraph 349 of Count XIX of the First Amended Complaint are directed against Defendant Paul Woolnough and

are not directed against ABI or ABC, and therefore no answer by ABI and ABC is required. ABI and ABC deny the allegations contained in paragraph 349 of Count XIX of the First Amended Complaint insofar as any allegation in paragraph 349 might be construed to pertain to them.

COUNT XX
VIOLATION OF RHODE ISLAND GENERAL LAWS
TITLE 9, CHAPTER 1, SECTION 2

350. ABI and ABC reassert and incorporate by reference their responses to paragraphs 1 through 271 and 344 through 347 of the First Amended Complaint, inclusive, as though fully set forth herein.

351. The allegations contained in paragraph 351 of Count XX of the First Amended Complaint appear to be directed against Defendant Paul Woolnough and are not directed against ABI or ABC, and therefore no answer by ABI and ABC is required. ABI and ABC deny the allegations contained in paragraph 351 of Count XX of the First Amended Complaint insofar as any allegation in paragraph 351 might be construed to pertain to them.

MANIC MUSIC MANAGEMENT, INC

352. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 352 of the First Amended Complaint.

353-355. The allegations contained in paragraphs 353 through 355 of the First Amended Complaint, inclusive, including all subparts, are directed

359. The allegations contained in paragraph 359 of Count XXII of the First Amended Complaint appear to be directed against Defendant Manic Music Management, Inc. and are not directed against ABI or ABC, and therefore no answer by ABI and ABC is required. ABI and ABC deny the allegations contained in paragraph 359 of Count XXII of the First Amended Complaint insofar as any allegation in paragraph 359 might be construed to pertain to them.

KNIGHT RECORDS, INC.

360. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 360 of the First Amended Complaint.

361-363. The allegations contained in paragraphs 361 through 363 of the First Amended Complaint, inclusive, including all subparts, are directed against Defendant Knight Records, Inc. and are not directed against ABI or ABC, and therefore no answer by ABI and ABC is required. ABI and ABC deny the allegations contained in paragraphs 361 through 363 of the First Amended Complaint, inclusive, including all subparts, insofar as any allegation in paragraphs 361 through 363, including any subpart, might be construed to pertain to them.

COUNT XXIII
KNIGHT RECORDS, INC. - NEGLIGENCE

364. ABI and ABC reassert and incorporate by reference their responses to paragraphs 1 through 271 and 360 through 363 of the First Amended Complaint, inclusive, as though fully set forth herein.

365. The allegations contained in paragraph 365 of Count XXIII of the First Amended Complaint are directed against Defendant Knight Records, Inc. and are not directed against ABI or ABC, and therefore no answer by ABI and ABC is required. ABI and ABC deny the allegations contained in paragraph 365 of Count XXIII of the First Amended Complaint insofar as any allegation in paragraph 365 might be construed to pertain to them.

COUNT XXIV
VIOLATION OF RHODE ISLAND GENERAL LAWS
TITLE 9, CHAPTER 1, SECTION 2

366. ABI and ABC reassert and incorporate by reference their responses to paragraphs 1 through 271 and 360 through 363 of the First Amended Complaint, inclusive, as though fully set forth herein.

367. The allegations contained in paragraph 367 of Count XXIV of the First Amended Complaint appear to be directed against Defendant Knight Records, Inc. and are not directed against ABI or ABC, and therefore no answer by ABI and ABC is required. ABI and ABC deny the allegations contained in paragraph 367 of Count XXIV of the First Amended Complaint insofar as any allegation in paragraph 367 might be construed to pertain to them.

DANIEL BIECHELE

368. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 368 of the First Amended Complaint.

369-371. The allegations contained in paragraphs 369 through 371 of the First Amended Complaint, inclusive, including all subparts, are directed against Defendant Daniel Biechele and are not directed against ABI or ABC, and therefore no answer by ABI and ABC is required. ABI and ABC deny the allegations contained in paragraphs 369 through 371 of the First Amended Complaint, inclusive, including all subparts, insofar as any allegation in paragraphs 369 through 371, including any subpart, might be construed to pertain to them.

COUNT XXV
DANIEL BIECHELE - NEGLIGENCE

372. ABI and ABC reassert and incorporate by reference their responses to paragraphs 1 through 271 and 368 through 371 of the First Amended Complaint, inclusive, as though fully set forth herein.

373. The allegations contained in paragraph 373 of Count XXV of the First Amended Complaint are directed against Defendant Daniel Biechele and are not directed against ABI or ABC, and therefore no answer by ABI and ABC is required. ABI and ABC deny the allegations contained in paragraph 373 of Count XXV of the First Amended Complaint insofar as any allegation in paragraph 373 might be construed to pertain to them.

COUNT XXVI
VIOLATION OF RHODE ISLAND GENERAL LAWS
TITLE 9, CHAPTER 1, SECTION 2

374. ABI and ABC reassert and incorporate by reference their responses to paragraphs 1 through 271 and 368 through 371 of the First Amended Complaint, inclusive, as though fully set forth herein.

375. The allegations contained in paragraph 375 of Count XXVI of the First Amended Complaint appear to be directed against Defendant Daniel Biechele and are not directed against ABI or ABC, and therefore no answer by ABI and ABC is required. ABI and ABC deny the allegations contained in paragraph 375 of Count XXVI of the First Amended Complaint insofar as any allegation in paragraph 375 might be construed to pertain to them.

ANHEUSER-BUSCH INCORPORATED AND
ANHEUSER-BUSCH COMPANIES, INCORPORATED

376. ABI and ABC admit that Anheuser-Busch, Inc. is a foreign corporation with its principal place of business in St. Louis, Missouri, and that it is registered to and does do business in Rhode Island. ABI and ABC admit that Anheuser-Busch Companies, Inc. is a foreign corporation with its principal place of business in St. Louis, Missouri. ABI and ABC deny the remaining allegations in paragraph 376 of the First Amended Complaint.

377. ABI and ABC admit that Anheuser-Busch, Inc. owns the registered trademark "Budweiser." Independent wholesalers such as McLaughlin &

Moran, Inc. are granted a limited, nonassignable and nontransferable right to use the trademark in distributing, advertising and promoting the sale of products. ABI and ABC admit that ABI expects that independent wholesalers will follow applicable law. ABI and ABC deny the remaining allegations contained in paragraph 377 of the First Amended Complaint.

378. ABI and ABC admit that under certain circumstances ABI's "Budweiser" trademark is used to promote brand awareness at licensed establishments. ABI and ABC deny the remaining allegations contained in paragraph 378 of the First Amended Complaint.

379. ABI and ABC deny the allegations contained in paragraph 379 of the First Amended Complaint.

380. ABI and ABC deny the allegations contained in paragraph 380 of the First Amended Complaint, including all subparts.

381. ABI and ABC deny the allegations contained in paragraph 381 of the First Amended Complaint. Further answering, ABI and ABC specifically deny the allegations contained in paragraph 381 of the First Amended Complaint to the extent they allege or infer a duty on the part of ABI or ABC.

382. ABI and ABC deny the allegations contained in paragraph 382 of the First Amended Complaint.

383. ABI and ABC deny the allegations contained in paragraph 383 of the First Amended Complaint.

384. ABI and ABC deny the allegations contained in paragraph 384 of the First Amended Complaint

COUNT XXVII
ANHEUSER-BUSCH - NEGLIGENCE

385. ABI and ABC reassert and incorporate by reference their responses to paragraphs 1 through 271 and 376 through 384 of the First Amended Complaint, inclusive, as though fully set forth herein.

386. ABI and ABC deny the allegations contained in paragraph 386 of the First Amended Complaint to the extent they allege an agency relationship between ABI and/or ABC and McLaughlin & Moran, Inc. The remainder of the allegations contained in paragraph 386 of the First Amended Complaint contain a legal conclusion to which no response is required and therefore ABI and ABC deny the same.

McLAUGHLIN & MORAN

387. ABI and ABC admit that McLaughlin & Moran, Inc. is the Rhode Island wholesaler of alcohol beverage products manufactured by ABI. ABI and ABC deny the remaining allegations contained in paragraph 387 of the First Amended Complaint.

388-392. ABI and ABC deny the allegations contained in paragraphs 388 through 392 of the First Amended Complaint, inclusive, including all subparts, to the extent they allege an agency relationship between McLaughlin &

Moran, Inc. and ABI and/or ABC. The remainder of the allegations contained in paragraphs 388 through 392 of the First Amended Complaint, inclusive, including all subparts, are directed against Defendant McLaughlin & Moran, Inc. and are not directed against ABI or ABC, and therefore no answer by ABI and ABC is required. ABI and ABC deny the remaining allegations contained in paragraphs 388 through 392 of the First Amended Complaint, inclusive, including all subparts, insofar as any of the remaining allegations in paragraphs 388 through 392, including any subpart, might be construed to pertain to them.

COUNT XXVIII
McLAUGHLIN & MORAN, INC. - NEGLIGENCE

393. ABI and ABC reassert and incorporate by reference their responses to paragraphs 1 through 271 and 387 through 392 of the First Amended Complaint, inclusive, as though fully set forth herein.

394. ABI and ABC deny the allegations contained in paragraph 394 of Count XXVIII of the First Amended Complaint to the extent they allege an agency relationship between McLaughlin & Moran, Inc. and ABI and/or ABC. The remainder of the allegations contained in paragraph 394 of Count XXVIII of the First Amended Complaint contain a legal conclusion to which no response is required.

WHJY, INC. AND CAPSTAR RADIO OPERATING COMPANY

395. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 395 of the First Amended Complaint.

396. The allegations contained in paragraph 396 of the First Amended Complaint are directed against Defendant WHJY, Inc. and are not directed against ABI or ABC, and therefore no answer by ABI and ABC is required. ABI and ABC deny the allegations contained in paragraph 396 of the First Amended Complaint insofar as any allegation in paragraph 396 might be construed to pertain to them.

397. The allegations contained in paragraph 397 of the First Amended Complaint, including all of its subparts, are directed against Defendant WHJY, Inc. and are not directed against ABI or ABC, and therefore no answer by ABI and ABC is required. Further answering, ABI and ABC deny the allegations contained in subparagraph (e) that ABI and/or ABC “promot[ed] the concert,” and that their employees “me[t] with others who were promoting the concert.” ABI and ABC deny the allegations contained in paragraph 397 of the First Amended Complaint, including all subparts, insofar as any allegation in paragraph 397, including any subpart, might be construed to pertain to them.

398-402. The allegations contained in paragraphs 398 through 402 of the First Amended Complaint, inclusive, are directed against Defendant

WHJY, Inc. and are not directed against ABI or ABC, and therefore no answer by ABI and ABC is required. ABI and ABC deny the allegations contained in paragraphs 398 through 402 of the First Amended Complaint, inclusive, insofar as any allegation in paragraphs 398 through 402 might be construed to pertain to them.

COUNT XXIX
WHJY, INC. AND/OR CAPSTAR - NEGLIGENCE

403. ABI and ABC reassert and incorporate by reference their responses to paragraphs 1 through 217 and 395 through 402 of the First Amended Complaint, inclusive, as though fully set forth herein.

404. The allegations contained in paragraph 404 of Count XXIX of the First Amended Complaint are directed against Defendants WHJY, Inc. and Capstar Radio Operating Company and are not directed against ABI or ABC, and therefore no answer by ABI and ABC is required. ABI and ABC deny the allegations contained in paragraph 404 of Count XXIX of the First Amended Complaint insofar as any allegation in paragraph 404 might be construed to pertain to them.

CLEAR CHANNEL BROADCASTING, INC.

405. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 405 of the First Amended Complaint.

406-408. The allegations contained in paragraphs 406 through 408 of the First Amended Complaint, inclusive, are directed against Defendant Clear Channel Broadcasting, Inc. and are not directed against ABI or ABC, and therefore no answer by ABI and ABC is required. ABI and ABC deny the allegations contained in paragraphs 406 through 408 of the First Amended Complaint, inclusive, insofar as any allegation in paragraphs 406 through 408 might be construed to pertain to them.

COUNT XXX
CLEAR CHANNEL BROADCASTING, INC. - NEGLIGENCE

409. ABI and ABC reassert and incorporate by reference their responses to paragraphs 1 through 271 and 395 through 408 of the First Amended Complaint, inclusive, as though fully set forth herein.

410. The allegations contained in paragraph 410 of Count XXX of the First Amended Complaint are directed against Defendant Clear Channel Broadcasting, Inc. and are not directed against ABI or ABC, and therefore no answer by ABI and ABC is required. ABI and ABC deny the allegations contained in paragraph 410 of Count XXX of the First Amended Complaint insofar as any allegation in paragraph 410 might be construed to pertain to them.

**DENIS P. LAROCQUE, ANTHONY BETTENCOURT
AND MALCOLM MOORE, IN HIS CAPACITY
AS FINANCE DIRECTOR OF THE TOWN OF WEST WARWICK**

411. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 411 of the First Amended Complaint.

412. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 412 of the First Amended Complaint.

413. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 413 of the First Amended Complaint.

414-416. The allegations contained in paragraphs 414 through 416 of the First Amended Complaint, inclusive, are directed against Defendant Denis P. Larocque and are not directed against ABI or ABC, and therefore no answer by ABI and ABC is required. ABI and ABC deny the allegations contained in paragraphs 414 through 416 of the First Amended Complaint, inclusive, insofar as any allegation in paragraphs 414 through 416 might be construed to pertain to them.

417-419. The allegations contained in paragraphs 417 through 419 of the First Amended Complaint, inclusive, are directed against Defendant Anthony Bettencourt and are not directed against ABI or ABC, and therefore no answer by ABI and ABC is required. ABI and ABC deny the allegations contained

in paragraphs 417 through 419 of the First Amended Complaint, inclusive, insofar as any allegation in paragraphs 417 through 419 might be construed to pertain to them.

420. The allegations contained in paragraph 420 of the First Amended Complaint, including all subparts, are directed against Defendant Town of West Warwick, being sued herein through its Finance Director, Defendant Malcolm Moore (hereinafter, the "Town") and are not directed against ABI or ABC, and therefore no answer by ABI and ABC is required. ABI and ABC deny the allegations contained in paragraph 420 of the First Amended Complaint, including all subparts, insofar as any allegation in paragraph 420, including any subpart, might be construed to pertain to them.

421. The allegations contained in paragraph 421 of the First Amended Complaint are directed against Defendants Denis P. Larocque and the Town and are not directed against ABI or ABC, and therefore no answer by ABI and ABC is required. ABI and ABC deny the allegations contained in paragraph 421 of the First Amended Complaint insofar as any allegation in paragraph 421 might be construed to pertain to them.

422. The allegations contained in paragraph 422 of the First Amended Complaint are directed against Defendant Anthony Bettencourt and are not directed against ABI or ABC, and therefore no answer by ABI and ABC is required. ABI and ABC deny the allegations contained in paragraph 422 of the First Amended Complaint insofar as any allegation in paragraph 422 might be construed to pertain to them.

423. The allegations contained in paragraph 423 of the First Amended Complaint are directed against Defendant Town and are not directed against ABI or ABC, and therefore no answer by ABI and ABC is required. ABI and ABC deny the allegations contained in paragraph 423 of the First Amended Complaint insofar as any allegation in paragraph 423 might be construed to pertain to them.

424. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 424. Further answering, the allegations contained in paragraph 424 of the First Amended Complaint are directed against Defendant Town and contain a legal conclusion to which no response is required by ABI. ABI and ABC deny the allegations contained in paragraph 424 of the First Amended Complaint insofar as any allegation in paragraph 424 might be construed to pertain to them.

425. The allegations contained in paragraph 425 of the First Amended Complaint are directed against Defendants Denis P. Larocque, Anthony Bettencourt, and the Town and are not directed against ABI or ABC, and therefore no answer by ABI and ABC is required. ABI and ABC deny the allegations contained in paragraph 425 of the First Amended Complaint insofar as any allegation in paragraph 425 might be construed to pertain to them.

COUNT XXXI
MALCOLM MOORE IN HIS CAPACITY AS FINANCE DIRECTOR
OF THE TOWN OF WEST WARWICK - NEGLIGENCE

426. ABI and ABC reassert and incorporate by reference their responses to paragraphs 1 through 271 and 411 through 425 of the First Amended Complaint, inclusive, as though fully set forth herein.

427. The allegations contained in paragraph 427 of Count XXXI of the First Amended Complaint are directed against Defendant Malcolm Moore, in his capacity as Finance Director of the Town of West Warwick, and are not directed against ABI or ABC, and therefore no answer by ABI and ABC is required. ABI and ABC deny the allegations contained in paragraph 427 of Count XXXI of the First Amended Complaint insofar as any allegation in paragraph 427 might be construed to pertain to them.

COUNT XXXII
DENIS P. LAROCQUE, FIRE INSPECTOR - NEGLIGENCE

428. ABI and ABC reassert and incorporate by reference their responses to paragraphs 1 through 271 and 411 through 425 of the First Amended Complaint, inclusive, as though fully set forth herein.

429. The allegations contained in paragraph 429 of Count XXXII of the First Amended Complaint are directed against Defendant Denis P. Larocque and are not directed against ABI or ABC, and therefore no answer by ABI and ABC is required. ABI and ABC deny the allegations contained in paragraph 429 of Count

XXXII of the First Amended Complaint insofar as any allegation in paragraph 429 might be construed to pertain to them.

COUNT XXXIII
VIOLATION OF RHODE ISLAND GENERAL LAWS
TITLE 9, CHAPTER 1, SECTION 2

430. ABI and ABC reassert and incorporate by reference their responses paragraphs 1 through 271 and 411 through 425 of the First Amended Complaint, inclusive, as though fully set forth herein.

431. The allegations contained in paragraph 431 of Count XXXIII of the First Amended Complaint are directed against Defendant Denis P. Larocque and are not directed against ABI or ABC, and therefore no answer by ABI and ABC is required. ABI and ABC deny the allegations contained in paragraph 431 of Count XXXIII of the First Amended Complaint insofar as any allegation in paragraph 431 might be construed to pertain to them.

COUNT XXXIV
ANTHONY BETTENCOURT - NEGLIGENCE

432. ABI and ABC reassert and incorporate by reference their responses to paragraphs 1 through 271 and 411 through 425 of the First Amended Complaint, inclusive, as though fully set forth herein.

433. The allegations contained in paragraph 433 of Count XXXIV of the First Amended Complaint are directed against Defendant Anthony Bettencourt and are not directed against ABI or ABC, and therefore no answer by ABI and ABC

is required. ABI and ABC deny the allegations contained in paragraph 433 of Count XXXIV of the First Amended Complaint insofar as any allegation in paragraph 433 might be construed to pertain to them.

**STATE OF RHODE ISLAND AND
IRVING J. OWENS, FIRE MARSHAL**

434. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 434. Further answering, the allegations contained in paragraph 434 of the First Amended Complaint are directed against Defendants State of Rhode Island Town and Irving J. Owens and contain a legal conclusion to which no response is required by ABI and ABC. ABI and ABC deny the allegations contained in paragraph 434 of the First Amended Complaint insofar as any allegation in paragraph 434 might be construed to pertain to them.

435-436. The allegations contained in paragraphs 435 through 436 of the First Amended Complaint, inclusive, are directed against Defendants State of Rhode Island and Irving J. Owens and are not directed against ABI or ABC, and therefore no answer by ABI and ABC is required. ABI and ABC deny the allegations contained in paragraphs 435 through 436 of the First Amended Complaint, inclusive, insofar as any allegation in paragraphs 435 through 436 might be construed to pertain to them.

COUNT XXXV
STATE OF RHODE ISLAND - NEGLIGENCE

437. ABI and ABC reassert and incorporate by reference their responses to paragraphs 1 through 271 and 434 through 436 of the First Amended Complaint, inclusive, as though fully set forth herein.

438. The allegations contained in paragraph 438 of Count XXXV of the First Amended Complaint are directed against Defendant State of Rhode Island and are not directed against ABI or ABC, and therefore no answer by ABI and ABC is required. ABI and ABC deny the allegations contained in paragraph 438 of Count XXXV of the First Amended Complaint insofar as any allegation in paragraph 438 might be construed to pertain to them.

COUNT XXXVI
IRVING J. OWENS - NEGLIGENCE

439. ABI and ABC reassert and incorporate by reference their responses to paragraphs 1 through 271 and 434 through 436 of the First Amended Complaint, inclusive, as though fully set forth herein.

440. The allegations contained in paragraph 440 of Count XXXVI of the First Amended Complaint are directed against Defendant Irving J. Owens and are not directed against ABI or ABC, and therefore no answer by ABI and ABC is required. ABI and ABC deny the allegations contained in paragraph 440 of Count XXXVI of the First Amended Complaint insofar as any allegation in paragraph 440 might be construed to pertain to them.

BRIAN BUTLER

441. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 441 of the First Amended Complaint.

442-444. The allegations contained in paragraphs 442 through 444 of the First Amended Complaint, inclusive, are directed against Defendant Brian Butler and are not directed against ABI or ABC, and therefore no answer by ABI and ABC is required. ABI and ABC deny the allegations contained in paragraphs 442 through 444 of the First Amended Complaint, inclusive, insofar as any allegation in paragraphs 442 through 444 might be construed to pertain to them.

COUNT XXXVII
BRIAN BUTLER - NEGLIGENCE

445. ABI and ABC reassert and incorporate by reference their responses to paragraphs 1 through 271 and 441 through 444 of the First Amended Complaint, inclusive, as though fully set forth herein.

446. The allegations contained in paragraph 446 of Count XXXVII of the First Amended Complaint are directed against Defendant Brian Butler and are not directed against ABI or ABC, and therefore no answer by ABI and ABC is required. ABI and ABC deny the allegations contained in paragraph 446 of Count XXXVII of the First Amended Complaint insofar as any allegation in paragraph 446 might be construed to pertain to them.

TVL BROADCASTING, INC.

447. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 447 of the First Amended Complaint.

448-450. The allegations contained in paragraphs 448 through 450 of the First Amended Complaint, inclusive, are directed against Defendant TVL Broadcasting, Inc. and are not directed against ABI or ABC, and therefore no answer by ABI and ABC is required. ABI and ABC deny the allegations contained in paragraphs 448 through 450 of the First Amended Complaint, inclusive, insofar as any allegation in paragraphs 448 through 450 might be construed to pertain to them.

COUNT XXXVIII
TVL BROADCASTING, INC. - NEGLIGENCE

451. ABI and ABC reassert and incorporate by reference their responses to paragraphs 1 through 279, 441 through 444 and 447 through 450 of the First Amended Complaint, inclusive, as though fully set forth herein.

452. The allegations contained in paragraph 452 of Count XXXVIII of the First Amended Complaint are directed against Defendant TVL Broadcasting, Inc. and are not directed against ABI or ABC, and therefore no answer by ABI and ABC is required. ABI and ABC deny the allegations contained in paragraph 452 of Count XXXVIII of the First Amended Complaint insofar as any allegation in paragraph 452 might be construed to pertain to them.

STC BROADCASTING, INC.

453. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 453 of the First Amended Complaint.

454-456. The allegations contained in paragraphs 454 through 456 of the First Amended Complaint, inclusive, are directed against Defendant STC Broadcasting, Inc. and are not directed against ABI or ABC, and therefore no answer by ABI and ABC is required. ABI and ABC deny the allegations contained in paragraphs 454 through 456 of the First Amended Complaint, inclusive, insofar as any allegation in paragraphs 454 through 456 might be construed to pertain to them.

COUNT XXXIX
STC BROADCASTING, INC. - NEGLIGENCE

457. ABI and ABC reassert and incorporate by reference their responses to paragraphs 1 through 279, 441 through 444 and 453 through 456 of the First Amended Complaint, inclusive, as though fully set forth herein.

458. The allegations contained in paragraph 458 of Count XXXIX of the First Amended Complaint are directed against Defendant STC Broadcasting, Inc. and are not directed against ABI or ABC, and therefore no answer by ABI and ABC is required. ABI and ABC deny the allegations contained in paragraph 458 of Count XXXIX of the First Amended Complaint insofar as any allegation in paragraph 458 might be construed to pertain to them.

BARRY H. WARNER

459. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 459 of the First Amended Complaint.

460-464. The allegations contained in paragraphs 460 through 464 of the First Amended Complaint, inclusive, are directed against Defendant Barry H. Warner and are not directed against ABI or ABC, and therefore no answer by ABI and ABC is required. ABI and ABC deny the allegations contained in paragraphs 460 through 464 of the First Amended Complaint, inclusive, insofar as any allegation in paragraphs 460 through 464 might be construed to pertain to them.

COUNT XL
BARRY H. WARNER - NEGLIGENCE

465. ABI and ABC reassert and incorporate by reference their responses to paragraphs 1 through 271 and 459 through 464 of the First Amended Complaint, inclusive, as though fully set forth herein.

466. The allegations contained in paragraph 466 of Count XL of the First Amended Complaint are directed against Defendant Barry H. Warner and are not directed against ABI or ABC, and therefore no answer by ABI and ABC is required. ABI and ABC deny the allegations contained in paragraph 466 of Count

XL of the First Amended Complaint insofar as any allegation in paragraph 466 might be construed to pertain to them.

COUNT XLI
VIOLATION OF RHODE ISLAND GENERAL LAWS
TITLE 9, CHAPTER 1, SECTION 2

467. ABI and ABC reassert and incorporate by reference their responses to paragraphs 1 through 271 and 459 through 464 of the First Amended Complaint, inclusive, as though fully set forth herein.

468. The allegations contained in paragraph 468 of Count XLI of the First Amended Complaint appear to be directed against Defendant Barry H. Warner and are not directed against ABI or ABC, and therefore no answer by ABI and ABC is required. ABI and ABC deny the allegations contained in paragraph 468 of Count XLI of the First Amended Complaint insofar as any allegation in paragraph 468 might be construed to pertain to them.

COUNT XLII
LUNA TECH, INC. - NEGLIGENCE

469. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 469 of the First Amended Complaint.

470-472. The allegations contained in paragraphs 470 through 472 of the First Amended Complaint, inclusive, including all subparts, are directed against Defendant Luna Tech, Inc. and are not directed against ABI or ABC, and

therefore no answer by ABI and ABC is required. ABI and ABC deny the allegations contained in paragraphs 470 through 472 of the First Amended Complaint, inclusive, including all subparts, insofar as any allegation in paragraphs 470 through 472, including any subpart, might be construed to pertain to them.

COUNT XLIII
LUNA TECH, INC. - STRICT LIABILITY

473. ABI and ABC reassert and incorporate by reference their responses to paragraphs 1 through 271 and 468 through 471 of the First Amended Complaint, inclusive, as though fully set forth herein.

474-477. The allegations contained in paragraphs 474 through 477 of Count XLIII of the First Amended Complaint, inclusive, are directed against Defendant Luna Tech, Inc. and are not directed against ABI or ABC, and therefore no answer by ABI and ABC is required. ABI and ABC deny the allegations contained in paragraphs 474 through 477 of Count XLIII of the First Amended Complaint, inclusive, insofar as any allegation in paragraphs 474 through 477 might be construed to pertain to them.

COUNT XLIV
LUNA TECH, INC. - BREACH OF WARRANTY

478. ABI and ABC reassert and incorporate by reference their responses to paragraphs 1 through 271 and 469 through 472 of the First Amended Complaint, inclusive, as though fully set forth herein.

479-480 The allegations contained in paragraphs 479 through 480 of Count XLIV of the First Amended Complaint, inclusive, are directed against Defendant Luna Tech, Inc. and are not directed against ABI or ABC, and therefore no answer by ABI and ABC is required. ABI and ABC deny the allegations contained in paragraphs 479 through 480 of Count XLIV of the First Amended Complaint, inclusive, insofar as any allegation in paragraphs 479 through 480 might be construed to pertain to them.

COUNT XLV
HIGH TECH SPECIAL EFFECTS, INC. - NEGLIGENCE

481. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 481 of Count XLV of the First Amended Complaint.

482-484. The allegations contained in paragraphs 482 through 484 of Count XLV of the First Amended Complaint, inclusive, including all subparts, are directed against Defendant High Tech Special Effects, Inc. and are not directed against ABI or ABC, and therefore no answer by ABI and ABC is required. ABI and ABC deny the allegations contained in paragraphs 481 through 484 of Count XLV of the First Amended Complaint, inclusive, including all subparts, insofar as any allegation in paragraphs 481 through 484, including any subpart, might be construed to pertain to them.

COUNT XLVI
HIGH TECH SPECIAL EFFECTS, INC. - STRICT LIABILITY

485. ABI and ABC reassert and incorporate by reference their responses to paragraphs 1 through 271 and 481 through 484 of the First Amended Complaint, inclusive, as though fully set forth herein.

486-489. The allegations contained in paragraphs 486 through 489 of Count XLVI of the First Amended Complaint, inclusive, are directed against Defendant High Tech Special Effects, Inc. and are not directed against ABI or ABC, and therefore no answer by ABI and ABC is required. ABI and ABC deny the allegations contained in paragraphs 486 through 489 of Count XLVI of the First Amended Complaint, inclusive, insofar as any allegation in paragraphs 486 through 489 might be construed to pertain to them.

COUNT XLVII
HIGH TECH SPECIAL EFFECTS, INC. - BREACH OF WARRANTY

490. ABI and ABC reassert and incorporate by reference their responses to paragraphs 1 through 271 and 481 through 484 of the First Amended Complaint, inclusive, as though fully set forth herein.

491-492. The allegations contained in paragraphs 491 through 492 of Count XLVII of the First Amended Complaint, inclusive, are directed against Defendant High Tech Special Effects, Inc. and are not directed against ABI or ABC, and therefore no answer by ABI and ABC is required. ABI and ABC deny the allegations contained in paragraphs 491 through 492 of Count XLVII of the First

Amended Complaint, inclusive, insofar as any allegation in paragraphs 491 through 492 might be construed to pertain to them.

COUNT XLVIII
AMERICAN FOAM CORPORATION - NEGLIGENCE

493. ABI and ABC reassert and incorporate by reference their responses to paragraphs 1 through 271 of the First Amended Complaint, inclusive, as though fully set forth herein.

494. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 494 of Count XLVIII of the First Amended Complaint.

495-498. The allegations contained in paragraphs 495 through 498 of Count XLVIII of the First Amended Complaint, inclusive, including all subparts, are directed against Defendant American Foam Corporation and are not directed against ABI or ABC, and therefore no answer by ABI and ABC is required. ABI and ABC deny the allegations contained in paragraphs 495 through 498 of Count XLVIII of the First Amended Complaint, inclusive, including all subparts, insofar as any allegation in paragraphs 495 through 498, including any subpart, might be construed to pertain to them.

COUNT XLIX
AMERICAN FOAM CORPORATION - STRICT LIABILITY

499. ABI and ABC reassert and incorporate by reference their responses to paragraphs 1 through 271 and 492 through 497 of the First Amended Complaint, inclusive, as though fully set forth herein.

500-503. The allegations contained in paragraphs 500 through 503 of Count XLIX of the First Amended Complaint, inclusive, are directed against Defendant American Foam Corporation and are not directed against ABI or ABC, and therefore no answer by ABI and ABC is required. ABI and ABC deny the allegations contained in paragraphs 500 through 503 of Count XLIX of the First Amended Complaint, inclusive, insofar as any allegation in paragraphs 500 through 503 might be construed to pertain to them.

COUNT L
AMERICAN FOAM CORPORATION - BREACH OF WARRANTY

504. ABI and ABC reassert and incorporate by reference their responses to paragraphs 1 through 271 and 493 through 498 of the First Amended Complaint, inclusive, as though fully set forth herein.

505-506. The allegations contained in paragraphs 505 through 506 of Count L of the First Amended Complaint, inclusive, are directed against Defendant American Foam Corporation and are not directed against ABI or ABC, and therefore no answer by ABI and ABC is required. ABI and ABC deny the allegations contained in paragraphs 505 through 506 of Count L of the First Amended

Complaint, inclusive, insofar as any allegation in paragraphs 505 through 506 might be construed to pertain to them.

COUNT LI
LEGGETT & PLATT INCORPORATED - NEGLIGENCE

507. ABI and ABC reassert and incorporate by reference their responses to paragraphs 1 through 271 and 513 through 532 of the First Amended Complaint, inclusive, as though fully set forth herein.

508. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 508 of Count LI of the First Amended Complaint.

509-511. The allegations contained in paragraphs 509 through 511 of Count LI of the First Amended Complaint, inclusive, including all subparts, are directed against Defendant Leggett & Platt Incorporated and are not directed against ABI or ABC, and therefore no answer by ABI and ABC is required. ABI and ABC deny the allegations contained in paragraphs 509 through 511 of Count LI of the First Amended Complaint, inclusive, including all subparts, insofar as any allegation in paragraphs 509 through 511, including any subpart, might be construed to pertain to them.

COUNT LII
LEGGETT & PLATT INCORPORATED - STRICT LIABILITY

512. ABI and ABC reassert and incorporate by reference their responses to paragraphs 1 through 271 and 508 through 511 of the First Amended Complaint, inclusive, as though fully set forth herein.

513-532. The allegations contained in paragraphs 513 through 532 of Count LII of the First Amended Complaint, inclusive, including all subparts, are directed against Defendant Leggett & Platt Incorporated and are not directed against ABI or ABC, and therefore no answer by ABI and ABC is required. ABI and ABC deny the allegations contained in paragraphs 513 through 532 of Count LII of the First Amended Complaint, inclusive, including all subparts, insofar as any allegation in paragraphs 513 through 532, including any subpart, might be construed to pertain to them.

COUNT LIII
LEGGETT & PLATT INCORPORATED - BREACH OF WARRANTY

533. ABI and ABC reassert and incorporate by reference their responses to paragraphs 1 through 271 and 513 through 532 of the First Amended Complaint, inclusive, as though fully set forth herein.

534-535. The allegations contained in paragraphs 534 through 535 of Count LIII of the First Amended Complaint, inclusive, are directed against Defendant Leggett & Platt Incorporated and are not directed against ABI or ABC, and therefore no answer by ABI and ABC is required. ABI and ABC deny the

allegations contained in paragraphs 534 through 535 of Count LIII of the First Amended Complaint, inclusive, insofar as any allegation in paragraphs 534 through 535 might be construed to pertain to them.

COUNT LIV
L & P FINANCIAL SERVICES CO. - NEGLIGENCE

536. ABI and ABC reassert and incorporate by reference their responses to paragraphs 1 through 271 and 541 through 560 of the First Amended Complaint, inclusive, as though fully set forth herein.

537. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 537 of Count LIV of the First Amended Complaint.

538-539. The allegations contained in paragraphs 538 through 539 of Count LIV of the First Amended Complaint, inclusive, including all subparts, are directed against Defendant L & P Financial Services Co. and are not directed against ABI or ABC, and therefore no answer by ABI and ABC is required. ABI and ABC deny the allegations contained in paragraphs 538 through 539 of Count LIV of the First Amended Complaint, inclusive, including all subparts, insofar as any allegation in paragraphs 538 through 539, including any subpart, might be construed to pertain to them.

COUNT LV
L & P FINANCIAL SERVICES CO. - STRICT LIABILITY

540. ABI and ABC reassert and incorporate by reference their responses to paragraphs 1 through 271 and 537 through 539 of the First Amended Complaint, inclusive, as though fully set forth herein.

541-560. The allegations contained in paragraphs 541 through 560 of Count LV of the First Amended Complaint, inclusive, including all subparts, are directed against Defendant L & P Financial Services Co. and are not directed against ABI or ABC, and therefore no answer by ABI and ABC is required. ABI and ABC deny the allegations contained in paragraphs 541 through 560 of Count LV of the First Amended Complaint, inclusive, including all subparts, insofar as any allegation in paragraphs 541 through 560, including any subpart, might be construed to pertain to them.

COUNT LVI
L&P FINANCIAL SERVICES CO. - BREACH OF WARRANTY

561. ABI and ABC reassert and incorporate by reference their responses to paragraphs 1 through 271 and 541 through 560 of the First Amended Complaint, inclusive, as though fully set forth herein.

562-563. The allegations contained in paragraphs 562 through 563 of Count LVI of the First Amended Complaint, inclusive, are directed against Defendant L & P Financial Services Co. and are not directed against ABI or ABC, and therefore no answer by ABI and ABC is required. ABI and ABC deny the

allegations contained in paragraphs 562 through 563 of Count LVI of the First Amended Complaint, inclusive, insofar as any allegation in paragraphs 562 through 563 might be construed to pertain to them.

COUNT LVII
GENERAL FOAM CORPORATION - NEGLIGENCE

564. ABI and ABC reassert and incorporate by reference their responses to paragraphs 1 through 271 and 569 through 588 of the First Amended Complaint, inclusive, as though fully set forth herein.

565. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 565 of Count LVII of the First Amended Complaint.

566-567. The allegations contained in paragraphs 566 through 567 of Count LVII of the First Amended Complaint, inclusive, including all subparts, are directed against Defendant General Foam Corporation and are not directed against ABI or ABC, and therefore no answer by ABI and ABC is required. ABI and ABC deny the allegations contained in paragraphs 566 through 567 of Count LVII of the First Amended Complaint, inclusive, including all subparts, insofar as any allegation in paragraphs 566 through 567, including any subpart, might be construed to pertain to them.

COUNT LVIII
GENERAL FOAM CORPORATION - STRICT LIABILITY

568. ABI and ABC reassert and incorporate by reference their responses to paragraphs 1 through 271 and 564 through 567 of the First Amended Complaint, inclusive, as though fully set forth herein.

569-588. The allegations contained in paragraphs 569 through 588 of Count LVIII of the First Amended Complaint, inclusive, including all subparts, are directed against Defendant General Foam Corporation and are not directed against ABI or ABC, and therefore no answer by ABI and ABC is required. ABI and ABC deny the allegations contained in paragraphs 569 through 588 of Count LVIII of the First Amended Complaint, inclusive, including all subparts, insofar as any allegation in paragraphs 569 through 588, including any subpart, might be construed to pertain to them.

COUNT LIX
GENERAL FOAM CORPORATION - BREACH OF WARRANTY

589. ABI and ABC reassert and incorporate by reference their responses to paragraphs 1 through 271 and 569 through 588 of the First Amended Complaint, inclusive, as though fully set forth herein.

590-591. The allegations contained in paragraphs 590 through 591 of Count LIX of the First Amended Complaint, inclusive, are directed against Defendant General Foam Corporation and are not directed against ABI or ABC, and therefore no answer by ABI and ABC is required. ABI and ABC deny the

allegations contained in paragraphs 590 through 591 of Count LIX of the First Amended Complaint, inclusive, insofar as any allegation in paragraphs 590 through 591 might be construed to pertain to them.

COUNT LX
GFC FOAM, LLC - NEGLIGENCE

592. ABI and ABC reassert and incorporate by reference their responses to paragraphs 1 through 271 and 598 through 617 of the First Amended Complaint, inclusive, as though fully set forth herein.

593. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 593 of Count LX of the First Amended Complaint.

594-596. The allegations contained in paragraphs 594 through 596 of Count LX of the First Amended Complaint, inclusive, including all subparts, are directed against Defendant GFC Foam, LLC and are not directed against ABI or ABC, and therefore no answer by ABI and ABC is required. ABI and ABC deny the allegations contained in paragraphs 594 through 596 of Count LX of the First Amended Complaint, inclusive, including all subparts, insofar as any allegation in paragraphs 594 through 596, including any subpart, might be construed to pertain to them.

COUNT LXI
GFC FOAM, LLC - STRICT LIABILITY

597. ABI and ABC reassert and incorporate by reference their responses to paragraphs 1 through 271 and 593 through 596 of the First Amended Complaint, inclusive, as though fully set forth herein.

598-617. The allegations contained in paragraphs 598 through 617 of Count LXI of the First Amended Complaint, inclusive, including all subparts, are directed against Defendant GFC Foam, LLC and are not directed against ABI or ABC, and therefore no answer by ABI and ABC is required. ABI and ABC deny the allegations contained in paragraphs 598 through 617 of Count LXI of the First Amended Complaint, inclusive, including all subparts, insofar as any allegation in paragraphs 598 through 617, including any subpart, might be construed to pertain to them.

COUNT LXII
GFC FOAM, LLC - BREACH OF WARRANTY

618. ABI and ABC reassert and incorporate by reference their responses to paragraphs 1 through 271 and 598 through 617 of the First Amended Complaint, inclusive, as though fully set forth herein.

619-620. The allegations contained in paragraphs 619 through 620 of Count LXII of the First Amended Complaint, inclusive, are directed against Defendant GFC Foam, LLC and are not directed against ABI or ABC, and therefore no answer by ABI and ABC is required. ABI and ABC deny the allegations

contained in paragraphs 619 through 620 of Count LXII of the First Amended Complaint, inclusive, insofar as any allegation in paragraphs 619 through 620 might be construed to pertain to them.

COUNT LXIII
FOAMEX LP - SUCCESSOR LIABILITY FOR
GENERAL FOAM CORPORATION

621. ABI and ABC reassert and incorporate by reference their responses to paragraphs 1 through 271 and 564 through 591 of the First Amended Complaint, inclusive, as though fully set forth herein.

622. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegation that Foamex LP is a "Delaware limited partnership and is the successor entity to General Foam Corporation." Further answering, the remainder of the allegations contained in paragraph 622 of Count LXIII of the First Amended Complaint are directed against defendant Foamex LP and are not directed against ABI or ABC, and therefore no answer by ABI and ABC is required. ABI and ABC deny the remaining allegations contained in paragraph 622 of Count LXIII of the First Amended Complaint insofar as any allegation in paragraph 622 might be construed to pertain to them.

COUNT LXIV
FOAMEX INTERNATIONAL INC. - LIABILITY FOR FOAMEX LP

623. ABI and ABC reassert and incorporate by reference their responses to paragraphs 1 through 271 and 621 through 622 of the First Amended Complaint, inclusive, as though fully set forth herein.

624. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 624 of Count LXIV of the First Amended Complaint.

625. The allegations contained in paragraph 625 of Count LXIV of the First Amended Complaint are directed against Defendant Foamex International Inc. and are not directed against ABI or ABC, and therefore no answer by ABI and ABC is required. ABI and ABC deny the allegations contained in paragraph 625 of Count LXIV of the First Amended Complaint insofar as any allegation in paragraph 625 might be construed to pertain to them.

COUNT LXV
FMXI, INC. - LIABILITY AS GENERAL PARTNER

626. ABI and ABC reassert and incorporate by reference their responses to paragraphs 1 through 271 and 621 through 622 of the First Amended Complaint, inclusive, as though fully set forth herein.

627. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 627 of Count LXV of the First Amended Complaint.

628. The allegations contained in paragraph 628 of Count LXV of the First Amended Complaint are directed against Defendant FMXI, Inc. and are not directed against ABI or ABC, and therefore no answer by ABI and ABC is required. ABI and ABC deny the allegations contained in paragraph 628 of Count LXV of the

First Amended Complaint insofar as any allegation in paragraph 628 might be construed to pertain to them.

COUNT LXVI
PMC, INC.

629. ABI and ABC reassert and incorporate by reference their responses to paragraphs 1 through 271 and 564 through 591 of the First Amended Complaint, inclusive, as though fully set forth herein.

630. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 630 of Count LXVI of the First Amended Complaint.

631. The allegations contained in paragraph 631 of Count LXVI of the First Amended Complaint are directed against Defendant PMC, Inc. and are not directed against ABI or ABC, and therefore no answer by ABI and ABC is required. ABI and ABC deny the allegations contained in paragraph 631 of Count LXVI of the First Amended Complaint insofar as any allegation in paragraph 631 might be construed to pertain to them.

COUNT LXVII
PMC GLOBAL, INC.

632. ABI and ABC reassert and incorporate by reference their responses to paragraphs 1 through 271 and 629 through 631 of the First Amended Complaint, inclusive, as though fully set forth herein.

633. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 633 of Count LXVII of the First Amended Complaint.

634. The allegations contained in paragraph 634 of Count LXVII of the First Amended Complaint are directed against Defendant PMC Global, Inc. and are not directed against ABI or ABC, and therefore no answer by ABI and ABC is required. ABI and ABC deny the allegations contained in paragraph 634 of Count LXVII of the First Amended Complaint insofar as any allegation in paragraph 634 might be construed to pertain to them.

COUNT LXVIII
JBL INCORPORATED f/k/a James B. Lansing Sound, Incorporated
d/b/a JBL Professional - NEGLIGENCE

635. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 635 of Count LXVIII of the First Amended Complaint.

636-643. The allegations contained in paragraphs 636 through 643 of Count LXVIII of the First Amended Complaint, inclusive, including all subparts, are directed against Defendant JBL Incorporated and are not directed against ABI or ABC, and therefore no answer by ABI and ABC is required. ABI and ABC deny the allegations contained in paragraphs 636 through 643 of Count LXVIII of the First Amended Complaint, inclusive, including all subparts, insofar as

any allegation in paragraphs 636 through 643, including any subpart, might be construed to pertain to them.

COUNT LXIX
JBL INCORPORATED - STRICT LIABILITY

644. ABI and ABC reassert and incorporate by reference their responses to paragraphs 1 through 271 and 635 through 643 of the First Amended Complaint, inclusive, as though fully set forth herein.

645-648. The allegations contained in paragraphs 645 through 648 of Count LXIX of the First Amended Complaint, inclusive, are directed against Defendant JBL Incorporated and are not directed against ABI or ABC, and therefore no answer by ABI and ABC is required. ABI and ABC deny the allegations contained in paragraphs 645 through 648 of Count LXIX of the First Amended Complaint, inclusive, insofar as any allegation in paragraphs 645 through 648 might be construed to pertain to them.

COUNT LXX
JBL INCORPORATED - BREACH OF WARRANTY

649. ABI and ABC reassert and incorporate by reference their responses to paragraphs 1 through 271 and 635 through 643 of the First Amended Complaint, inclusive, as though fully set forth herein.

650-651. The allegations contained in paragraphs 650 through 651 of Count LXX of the First Amended Complaint, inclusive, are directed against Defendant JBL Incorporated and are not directed against ABI or ABC, and therefore

no answer by ABI and ABC is required. ABI and ABC deny the allegations contained in paragraphs 650 through 651 of Count LXX of the First Amended Complaint, inclusive, insofar as any allegation in paragraphs 650 through 651 might be construed to pertain to them.

**ESSEX INSURANCE COMPANY, MULTI-STATE INSPECTIONS, INC.
AND HIGH CALIBER INSPECTIONS, INC.**

652. ABI and ABC reassert and incorporate by reference their responses to paragraphs 1 through 271 of the First Amended Complaint, inclusive, as though fully set forth herein.

653. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 653 of the First Amended Complaint.

654. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 654 of the First Amended Complaint.

655. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 655 of the First Amended Complaint.

656-659. The allegations contained in paragraphs 656 through 659 of the First Amended Complaint, inclusive, including all subparts, are directed against Defendants Essex Insurance Company, Multi-State Inspections, Inc. and High Caliber Inspections, Inc. and are not directed against ABI or ABC, and

therefore no answer by ABI and ABC is required. ABI and ABC deny the allegations contained in paragraphs 656 through 659 of the First Amended Complaint, inclusive, including all subparts, insofar as any allegation in paragraphs 656 through 659, including any subpart, might be construed to pertain to them.

COUNT LXXI
ESSEX INSURANCE COMPANY - NEGLIGENCE

660. ABI and ABC reassert and incorporate by reference their responses to paragraphs 1 through 271 and 653 through 659 of the First Amended Complaint, inclusive, as though fully set forth herein.

661. The allegations contained in paragraph 661 of Count LXXI of the First Amended Complaint are directed against Defendant Essex Insurance Company and are not directed against ABI or ABC, and therefore no answer by ABI and ABC is required. ABI and ABC deny the allegations contained in paragraph 661 of Count LXXI of the First Amended Complaint insofar as any allegation in paragraph 661 might be construed to pertain to them.

COUNT LXXII
MULTI-STATE INSPECTIONS, INC. - NEGLIGENCE

662. ABI and ABC reassert and incorporate by reference their responses to paragraphs 1 through 271 and 653 through 659 of the First Amended Complaint, inclusive, as though fully set forth herein.

663. The allegations contained in paragraph 663 of Count LXXII of the First Amended Complaint are directed against Defendant Multi-State

Inspections, Inc. and are not directed against ABI or ABC, and therefore no answer by ABI and ABC is required. ABI and ABC deny the allegations contained in paragraph 663 of Count LXXII of the First Amended Complaint insofar as any allegation in paragraph 663 might be construed to pertain to them.

COUNT LXXIII
HIGH CALIBER INSPECTIONS, INC. - NEGLIGENCE

664. ABI and ABC reassert and incorporate by reference their responses to paragraphs 1 through 271 and 653 through 659 of the First Amended Complaint, inclusive, as though fully set forth herein.

665. The allegations contained in paragraph 665 of Count LXXIII of the First Amended Complaint are directed against Defendant High Caliber Inspections, Inc. and are not directed against ABI or ABC, and therefore no answer by ABI and ABC is required. ABI denies the allegations contained in paragraph 665 of Count LXXIII of the First Amended Complaint insofar as any allegation in paragraph 665 might be construed to pertain to them.

UNDERWRITERS AT LLOYD'S, LONDON AND
GRESHAM & ASSOCIATES OF R.I., INC.

666. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 666 of the First Amended Complaint.

667. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 667 of the First Amended Complaint.

668. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 668 of the First Amended Complaint.

669. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 669 of the First Amended Complaint.

670. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 670 of the First Amended Complaint.

671-675. The allegations contained in paragraphs 671 through 675 of the First Amended Complaint, inclusive, including all subparts, are directed against Defendants Underwriters at Lloyd's, London and Gresham & Associates of R.I., Inc. and are not directed against ABI or ABC, and therefore no answer by ABI and ABC is required. ABI and ABC deny the allegations contained in paragraphs 671 through 675 of the First Amended Complaint, inclusive, including all subparts, insofar as any allegation in paragraphs 671 through 675, including any subpart, might be construed to pertain to them.

COUNT LXXIV
UNDERWRITERS AT LLOYD'S, LONDON - NEGLIGENCE

676. ABI and ABC reassert and incorporate by reference their responses to paragraphs 1 through 271 and 666 through 675 of the First Amended Complaint, inclusive, as though fully set forth herein.

677. The allegations contained in paragraph 677 of Count LXXIV of the First Amended Complaint are directed against Defendant Underwriters at Lloyd's, London and are not directed against ABI or ABC, and therefore no answer by ABI and ABC is required. ABI and ABC deny the allegations contained in paragraph 677 of Count LXXIV of the First Amended Complaint insofar as any allegation in paragraph 677 might be construed to pertain to them.

COUNT LXXV
GRESHAM & ASSOCIATES OF R.I., INC. - NEGLIGENCE

678. ABI and ABC reassert and incorporate by reference their responses to paragraphs 1 through 271 and 666 through 675 of the First Amended Complaint, inclusive, as though fully set forth herein.

679. The allegations contained in paragraph 679 of Count LXXV of the First Amended Complaint are directed against Defendant Gresham & Associates of R.I., Inc. and are not directed against ABI or ABC, and therefore no answer by ABI and ABC is required. ABI and ABC deny the allegations contained in paragraph 679 of Count LXXV of the First Amended Complaint insofar as any allegation in paragraph 679 might be construed to pertain to them.

ABC BUS, INC. d/b/a ABC BUS LEASING, INC.

680. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 680 of the First Amended Complaint.

681. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 681 of the First Amended Complaint.

682-683. The allegations contained in paragraphs 682 through 683 of the First Amended Complaint, inclusive, are directed against Defendant ABC Bus, Inc. and are not directed against ABI or ABC, and therefore no answer by ABI and ABC is required. ABI and ABC deny the allegations contained in paragraphs 682 through 683 of the First Amended Complaint, inclusive, insofar as any allegation in paragraphs 682 through 683 might be construed to pertain to them.

COUNT LXXVI
ABC BUS, INC. d/b/a ABC BUS LEASING, INC. - NEGLIGENCE

684. ABI and ABC reassert and incorporate by reference their responses to paragraphs 1 through 271 and 680 through 683 of the First Amended Complaint, inclusive, as though fully set forth herein.

685. The allegations contained in paragraph 685 of Count LXXVI of the First Amended Complaint are directed against Defendant ABC Bus, Inc. and are not directed against ABI or ABC, and therefore no answer by ABI and ABC is

required. ABI and ABC deny the allegations contained in paragraph 685 of Count LXXVI of the First Amended Complaint insofar as any allegation in paragraph 685 might be construed to pertain to them.

COUNT LXXVII
VIOLATION OF RHODE ISLAND GENERAL LAWS
TITLE 9, CHAPTER 1, SECTION 2

686. ABI and ABC reassert and incorporate by reference their responses to paragraphs 1 through 271 and 680 through 683 of the First Amended Complaint, inclusive, as though fully set forth herein.

687. The allegations contained in paragraph 687 of Count LXXVII of the First Amended Complaint appear to be directed against Defendant ABC Bus, Inc. and are not directed against ABI or ABC, and therefore no answer by ABI and ABC is required. ABI and ABC deny the allegations contained in paragraph 687 of Count LXXVII of the First Amended Complaint insofar as any allegation in paragraph 687 might be construed to pertain to them.

SUPERSTAR SERVICES LLC

688. ABI and ABC are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 688 of the First Amended Complaint.

689-691. The allegations contained in paragraphs 689 through 691 of the First Amended Complaint, inclusive, are directed against Defendant Superstar Services LLC and are not directed against ABI or ABC, and therefore no

answer by ABI and ABC is required. ABI and ABC deny the allegations contained in paragraphs 689 through 691 of the First Amended Complaint, inclusive, insofar as any allegation in paragraphs 689 through 691 might be construed to pertain to them.

COUNT LXXVIII
SUPERSTAR SERVICES LLC - NEGLIGENCE

692. ABI and ABC reassert and incorporate by reference their responses to paragraphs 1 through 271 and 688 through 691 of the First Amended Complaint, inclusive, as though fully set forth herein.

693. The allegations contained in paragraph 693 of Count LXXVIII of the First Amended Complaint are directed against Defendant Superstar Services LLC and are not directed against ABI or ABC, and therefore no answer by ABI and ABC is required. ABI and ABC deny the allegations contained in paragraph 693 of Count LXXVIII of the First Amended Complaint insofar as any allegation in paragraph 693 might be construed to pertain to them.

COUNT LXXIX
VIOLATION OF RHODE ISLAND GENERAL LAWS
TITLE 9, CHAPTER 1, SECTION 2

694. ABI and ABC reassert and incorporate by reference their responses to paragraphs 1 through 271 and 688 through 691 of the First Amended Complaint, inclusive, as though fully set forth herein.

695. The allegations contained in paragraph 695 of Count LXXIX of the First Amended Complaint appear to be directed against Defendant Superstar

Services LLC and are not directed against ABI or ABC, and therefore no answer by ABI and ABC is required. ABI and ABC deny the allegations contained in paragraph 695 of Count LXXIX of the First Amended Complaint insofar as any allegation in paragraph 695 might be construed to pertain to them.

COUNT LXXX
“JOHN DOE” DEFENDANTS - NEGLIGENCE

696. ABI and ABC reassert and incorporate by reference their responses to paragraphs 1 through 271 of the First Amended Complaint, inclusive, as though fully set forth herein.

697. The allegations contained in paragraph 697 of Count LXXX of the First Amended Complaint are directed against “John Doe” Defendants who manufactured, distributed, sold or installed non-flame-retardant foam or other defective products in use at the Station nightclub on February 20, 2003. Neither ABI nor ABC manufactured, distributed, sold, or installed such products, and therefore the allegations in paragraph 697 of Count LXXX of the First Amended Complaint are not directed against ABI or ABC and no answer by ABI and ABC is required. ABI and ABC deny the allegations contained in paragraph 697 of Count LXXX of the First Amended Complaint insofar as any allegation in paragraph 697 might be construed to pertain to it.

698. The allegations contained in paragraph 698 of Count LXXX of the First Amended Complaint are directed against “John Doe” Defendants who inspected the premises after installation of the foam or other defective products prior

to February 20, 2003. Neither ABI nor ABC inspected the premises or was required to inspect the premises after installation of such products prior to February 20, 2003, and therefore the allegations in paragraph 698 of Count LXXX of the First Amended Complaint are not directed against ABI or ABC and no answer by ABI and ABC is required. ABI and ABC deny the allegations contained in paragraph 698 of Count LXXX of the First Amended Complaint insofar as any allegation in paragraph 698 might be construed to pertain to them.

699. The allegations contained in paragraph 699 of Count LXXX of the First Amended Complaint are directed against “John Doe” Defendants who promoted, managed, or produced the appearance of Great White at The Station nightclub on February 20, 2003. Neither ABI nor ABC promoted, managed, or produced the appearance of Great White at The Station nightclub on February 20, 2003, and therefore the allegations in paragraph 699 of Count LXXX of the First Amended Complaint are not directed against ABI or ABC and no answer by ABI and ABC is required. ABI and ABC deny the allegations contained in paragraph 699 of Count LXXX of the First Amended Complaint insofar as any allegation in paragraph 699 might be construed to pertain to them.

700. The allegations contained in paragraph 700 of Count LXXX of the First Amended Complaint are directed against “John Doe” Defendants who received property from Triton Realty-related persons or entities with intent to hinder, delay or defraud Plaintiffs. Neither ABI and ABC received property from Triton Realty-related persons, and therefore the allegations in paragraph 700 of Count

LXXX of the First Amended Complaint are not directed against ABI or ABC and no answer by ABI and ABC is required. ABI and ABC deny the allegations contained in paragraph 700 of Count LXXX of the First Amended Complaint insofar as any allegation in paragraph 700 might be construed to pertain to them.

701. The allegations contained in paragraph 701 of Count LXXX of the First Amended Complaint are directed against “John Doe” Defendants who were negligent and such negligence was a proximate cause of Plaintiffs’ injuries or death. ABI and ABC deny that they were negligent and that any of their actions or omissions was the proximate cause of Plaintiffs’ injuries or death.

COUNT LXXXI
“JOHN DOE” DEFENDANTS - STRICT LIABILITY

702. ABI and ABC reassert and incorporate by reference their responses to paragraphs 1 through 271 and 696 through 701 of the First Amended Complaint, inclusive, as though fully set forth herein.

703-706. The allegations contained in paragraphs 703 through 706 of Count LXXXI of the First Amended Complaint, inclusive, appear to be directed against “John Doe” Defendants who manufactured, distributed, sold, or installed foam products. Neither ABI nor ABC manufactured, distributed, sold or installed foam products, and therefore the allegations in paragraphs 703-706 of Count LXXXI of the First Amended Complaint are not directed against ABI or ABC and no answer by ABI and ABC is required. ABI and ABC deny the allegations contained in paragraphs 703 through 706 of Count LXXXI of the First Amended

Complaint, inclusive, insofar as any allegation in paragraphs 703 through 706 might be construed to pertain to them.

ABI and ABC deny the allegations contained in the unnumbered paragraphs following paragraph 706 of Count LXXXI of the First Amended Complaint (pages 142 – 145) and further deny that they are liable to Plaintiffs or anyone else for any amount.

As further answer to Plaintiffs' First Amended Complaint, ABI and ABC deny all allegations and subparts contained therein which are not expressly admitted herein or otherwise pleaded to.

AFFIRMATIVE DEFENSES

For further answer to the First Amended Complaint and by way of affirmative defense, ABI and ABC state:

FIRST AFFIRMATIVE DEFENSE

ABI and ABC assert the affirmative defense that the First Amended Complaint fails to state any claim against either ABI or ABC upon which any relief, whether compensatory, exemplary, punitive, or otherwise can be granted.

SECOND AFFIRMATIVE DEFENSE

ABI and ABC assert the affirmative defense that neither ABI nor ABC owed a duty of care to those injured or killed as a result of the fire at The Station nightclub.

THIRD AFFIRMATIVE DEFENSE

ABI and ABC assert the affirmative defense that any alleged injuries or damages sustained by Plaintiffs were not directly or proximately caused by any direct or indirect act or any omission of ABI or ABC but were the result of independent, intervening and/or superseding negligent and/or criminal acts or omissions of parties or non parties over whom ABI and/or ABC had no control and for whom ABI and/or ABC are not legally responsible.

FOURTH AFFIRMATIVE DEFENSE

ABI and ABC assert the affirmative defense that comparative fault was a proximate cause of any alleged injuries and damages sustained by Plaintiffs or their decedents. Accordingly, Plaintiffs' claims are barred or limited by such fault or negligence.

FIFTH AFFIRMATIVE DEFENSE

ABI and ABC assert the affirmative defense of mitigation of damages, and therefore Plaintiffs are precluded from recovering damages or their damages are reduced by operation of the doctrine of avoidable consequences and assumption of the risk.

SIXTH AFFIRMATIVE DEFENSE

ABI and ABC assert the affirmative defense that Plaintiffs' claims against ABI and ABC are barred because at no time related to the events alleged in the First

Amended Complaint did any agency or joint venture relationship exist between ABI and/or ABC and any other named defendant.

SEVENTH AFFIRMATIVE DEFENSE

ABI and ABC assert the affirmative defense that under the laws applicable to this case and to the extent claimed by Plaintiffs, no punitive damages can be recovered by Plaintiffs as punitive damages are appropriate only when there is proof that the acts complained of were done with malice and bad faith, and with the intent to cause harm.

EIGHTH AFFIRMATIVE DEFENSE

ABI and ABC assert the affirmative defense that to the extent Plaintiffs seek to impose punitive damages, any such claim for punitive damages would be unconstitutional under the United States Constitution and applicable provisions of the Rhode Island State Constitution and unlawful under applicable States' statutes to the extent that, among other things: (1) ABI's and ABC's liability for punitive damages and the appropriate amount of punitive damages are not required to be established by clear and convincing evidence; (2) punitive damages are sought to be awarded without bifurcating the trial of all punitive damages issues; (3) any award of punitive damages is sought with no predetermined limit, such as a maximum multiple of compensatory damages or a maximum amount on the amount of punitive damages that the court or a jury may impose; (4) any award of punitive damages is based on anything other than ABI's and/or ABC's alleged conduct in connection

with the transaction at issue in this lawsuit; or (5) an award of punitive damages is sought for the purpose of compensating Plaintiffs for elements of damage not otherwise recognizable by applicable State law.

NINTH AFFIRMATIVE DEFENSE

ABI and ABC assert the affirmative defense that to the extent Plaintiffs seek to impose punitive or exemplary damages, Plaintiffs' claims for punitive or exemplary damages are barred or reduced by applicable law or statute or, in the alternative, are unconstitutional insofar as they violate the due process protections afforded by the United States Constitution, the excessive fines clause of the Eighth Amendment of the United States Constitution, the Commerce Clause of the United States Constitution, the Full Faith Credit Clause of the United States Constitution, and applicable provisions of the Constitution of the State of Rhode Island. Any law, statute or other authority purporting to permit the recovery of punitive damages in this case is unconstitutional, facially and as applied, to the extent that, without limitation, it: (1) lacks constitutionally sufficient standards to guide the discretion used in determining whether to award punitive damages; (2) is void for vagueness in that it fails to provide adequate advance notice as to what conduct will result in punitive damages; (3) unconstitutionally may permit recovery of punitive damages in any amount that is not both reasonable and proportionate to the amount of harm, if any to Plaintiffs and to the amount of compensatory damages, if any; (5) unconstitutionally may permit consideration of net worth or other financial

information; (6) does not expressly prohibit awarding punitive damages, or determining the amount of an award of punitive damages, in whole or in part, on the basis of individually discriminatory characteristics, including the corporate status of ABI or ABC; (7) lacks constitutionally sufficient standards to be applied by the trial court in post-verdict review of any punitive damages award; (8) lacks constitutionally sufficient standards for appellate review of any punitive damages award; and (9) otherwise fails to satisfy Supreme Court precedent.

TENTH AFFIRMATIVE DEFENSE

ABC asserts the affirmative defense of lack of personal jurisdiction over it by this Court and the State Court from which the action was removed.

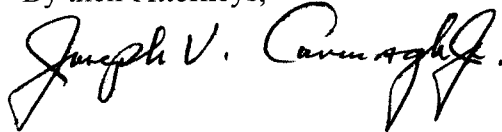
WHEREFORE, Defendants Anheuser-Busch, Inc. and Anheuser-Busch Companies, Inc. pray that:

- (a) the First Amended Complaint be dismissed with prejudice as to Anheuser-Busch, Inc. and Anheuser-Busch Companies, Inc.;
- (b) Plaintiffs' demand for relief against Anheuser-Busch, Inc. and Anheuser-Busch Companies, Inc. be denied in every respect;
- (c) Anheuser-Busch, Inc. and Anheuser-Busch Companies, Inc. be awarded costs in connection with this litigation, including reasonable attorneys' fees; and
- (d) the Court grant such other and further relief as may be just, proper, and equitable.

**DEFENDANTS ANHEUSER-BUSCH, INC. AND ANHEUSER-BUSCH
COMPANIES, INC. HEREBY DEMAND TRIAL BY JURY**

ANHEUSER-BUSCH, INC. AND
ANHEUSER-BUSCH COMPANIES, INC.,

By their Attorneys,



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Dated: February 4, 2005

CERTIFICATE OF SERVICE

I hereby certify that I caused to be served a copy of the within document in pdf format by electronic email on the 4th day of February, 2005, to the following counsel of record:

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